

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE February 5, 1981

SUBJECT Meeting Summary - Pine Bluff Arsenal, Arkansas Hazardous Waste Landfill

FROM Jim Highland, Federal Facilities Compliance Officer (6AEWC) - ENFORCEMENT DIVISION

AR 00710

TO Diana Dutton, Director Enforcement Division (6AE)

Subject meeting was held January 22, 1981 in the office of the Arkansas Department of Pollution Control and Ecology in Little Rock. A roster of participants is attached. A summary of the discussions and conclusions follows:

1. Army representatives informed us that Congress has authorized additional Binary Munition production facilities at Pine Bluff Arsenal, beyond the Phase I facility discussed in our October, 1980 meeting. Total production capacity has been increased by Phase II to 96,000 pounds of DF agent per day (Phase I proposed a 6,000 pounds/day facility). The new production facilities will be constructed in Area 5 at the Arsenal, which was formerly used for the production of mustard and Lewisite gas and DDT, and hazardous residues from those former activities still contaminate the buildings, utilities and soil on the site of the proposed construction.

2. The Army proposes to construct a hazardous waste landfill at the Arsenal to receive the contaminated debris and soil resulting from removal of the buildings and utilities and clearing of the new construction site. The landfill will also be designed for disposal of hazardous wastes from future Arsenal production and for final disposal of hazardous material eventually removed from several uncontrolled disposal sites identified at the Arsenal. The purpose of this meeting, according to the Army personnel, was to determine what will be required to provide a landfill likely to meet current or forthcoming State and/or RCRA regulations for landfill disposal of hazardous wastes.

3. The landfill is part of a project which includes clearing and decontamination of the Binary plant construction site and construction of containment basins downstream of the Binary site to catch contaminated runoff during the clearing and construction. The Army representative said that, due to the high priority and urgency of the Binary production program, this project must be programmed for FY 83 funding and their budget estimates must be into Army Headquarters by January 26, 1981. This urgency won't allow them to wait for publication of RCRA landfill regulations, and they want to try and make their cost estimates generous enough to cover anticipated requirements of those regulations. In the absence of firm information on the forthcoming RCRA regulations, we reviewed and discussed existing State regulations for siting and design of chemical waste landfills. All parties agreed that the State regulations appear to be at least as stringent as those expected from RCRA and that cost estimates based on meeting the State regulations should also allow for compliance with RCRA regulations.

is an action here appropriate necessary?

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4. Army estimates call for eventual construction of between 60 and 80 acres of landfill trenches or cells to provide for anticipated chemical waste disposal at the Arsenal for the next 30 years. Total area required for these and additional security and supporting facilities anticipated to comply with the State and/or RCRA regulations will be approximately 160 acres. Current plans are to design and construct an initial 2 1/2 - acre trench to receive the contaminated rubble and soil from the clearing and cleanup of the Binary plant construction area and initial production wastes from the Binary facilities. Additional trenches would be constructed as needed for disposal of subsequent wastes from all Arsenal production facilities and hazardous materials removed in the future cleanup of the uncontrolled hazardous waste dumps identified at the Arsenal. Support facilities and security provisions for the initial landfill operation will require a fenced area of about 4 acres, which also will be expanded as the landfill grows.

5. The Corps of Engineers will conduct the necessary investigations to do the siting for 60-80 acres of landfill and will design the initial 2 1/2 - acre trench, all in accordance with current State regulations. The Corps will seek project concurrence review from the State and EPA at a minimum of four stages in the project planning. These will include (1) the scope of field investigations, (2) concept design, (3) semi-final design, and (4) final design. Upon completion of the final design documents, the Army will file an application for a State hazardous waste disposal permit, which application will include the final planning documents. If necessary, an additional application for a RCRA permit will also be filed.

6. No definite project milestone dates were set at this meeting, but our discussions brought out that (1) the application review-public hearing period may take as long as 6 months before a permit is issued and (2) construction on the landfill will start as early in FY83 as possible. Milestone dates will be determined with this information in mind.

Attachment